EQ CHAPTER \h \r 1]**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION 6
1201 Elm Street, SUITE 500
DALLAS, TX 75270

November 13, 2019

MEMORANDUM

Subject: Lane Plating- Sampling and Analysis Plan Phase II

From: Chelsea Hidalgo, MS
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To: Kenneth Shewmake
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The memorandum provides comments on the Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00 for Lane Plating Works, Inc Superfund Site.

1. Surface water background sampling currently lists 1 sample (BLSW-3) to include field parameters of Hardness, Total Dissolved Solids (TDS), Total Suspended Solids (TSS), Alkalinity, Total Organic Carbon (TOC) and Dissolved Organic Carbon (DOC). It is recommended to include 1 additional sample for these parameters from the unnamed stream to the east of the site to account for differences in location, habitat type, topography, and proximity to the site.

2. PFAS were prevalent in both groundwater and surface water results from the Phase 1 Data Summary Technical Memorandum (DSTM). Currently Phase II recommends only sampling PFAS for groundwater. The Conceptual Site Model (CSM) states that "groundwater may emanate as surface water at various points (e.g., gaining streams) around the site" (EA, 2019). With the potential for groundwater to surface water flow, I would recommend including surface water sampling of PFAS for the Phase II sampling and analysis plan (SAP).

3. PFAS should also be considered for background study. Background information would be useful in analyzing results from groundwater, as well as surface water if included. Although metals are the main risk driver for the site, the potential risk of PFAS to ecological receptors should be evaluated.

References

EA. 2019. Conceptual Site Model Technical Memorandum, Remedial Investigation. Lane Plating Works, Inc, Superfund Site. Dallas, Dallas County, Texas. March 2019.